

DRAFT

March 27, 1997

Honorable Douglas Wheeler
Secretary of Resources
1416 Ninth Street, 13th Floor
Sacramento, CA 95814

Subject: Delta Protection Commission Comments on the Governor's Flood
Emergency Action Team 30 Day Report

Dear Secretary Wheeler:

Thank you for the opportunity to comment on the FEAT 30 Day Report. The Delta Protection Commission is very concerned about floods and flooding largely due to its location at the confluence of the two large waterways, the Sacramento and San Joaquin Rivers, and its land surface elevations near and below sea level. Protection and maintenance of the levees, which define land forms in the Delta, are the keys to flood control in this region.

Comments on the 30 Day Report:

The report directs Department of Water Resources to install new stream gauging stations and telemetry to provide real time data for areas found to be deficient in the January event. The east side waterways, particularly the Cosumnes and the Mokelumne Rivers, should be evaluated for additional gauging stations. These waterways resulted in flooding in the Sacramento County area. No data on the flows of these waterways is included in the 30 Day report (see maps following page 10).

The report directs Office of Emergency Services to conduct workshops with State, local and federal agencies in areas at risk during this flood season, to review roles and procedures related to dissemination of flood information and public warnings. The Delta Protection Commission has already contacted your staff to suggest that such a meeting be held in the Delta, either in conjunction with a Commission meeting, or at a separate venue.

The report directs CALFED to optimize use of Proposition 204 funds for dual purpose projects which incorporate both flood control and habitat restoration; the Commission looks forward to reviewing and commenting on any joint projects which may be proposed in the Delta.

120 Day Report:

The Commission looks forward to reviewing the 120 Day report which will include:

- Potential long-term activities and actions for implementation to address Sacramento-San Joaquin River flood control system deficiencies.
- A comprehensive study of the Sacramento and San Joaquin Flood Control Projects, including the Delta, including evaluation of reservoir, river channel, and levee system capability and the level of protection currently provided.
- Alternative means of providing increased flood control capacity, such as new or enlarged flood bypass or levee setback systems. This approach is identified as “particularly useful in areas where there is little permanent infrastructure or development such as...the Delta.”
- Evaluation of non-structural means of improving flood channel capability through debris removal, improved channel clearing and maintenance, and carefully managed sediment and gravel removal, particularly in light of possible environmental impacts and cost effectiveness.
- Evaluation of on and off stream storage facilities that could complement the flood bypass system and provide additional water supplies while providing a higher level of flood protection.
- Evaluation of pre-flood maintenance and repair practices required by environmental regulation, and to what extent that regulation may have impacted levee safety.
- Recommendations regarding emergency response and operations needs, such as flood information and public warnings, and an overall evaluation of the coordination of the emergency response from local level through State government.

The Commission urges close scrutiny of the non-structural means of improving flood channel capability. As noted in letters submitted earlier to you by groups representing Delta landowners, there has been substantial deposition of sediment in certain channels adjacent to and in the Delta. This deposition of sediment and other channel blockage is limited the effectiveness of channels to transport flood flows. In some areas where there has been substantial deposition, there is the need to provide offsetting flood protection by raising levee height.

Delta Protection Act:

The Act which authorized the Commission states in Section 29704:

“The Legislature further finds and declares that the leveed islands and tracts of the delta and portions of its uplands are floodprone areas of critical statewide significance due to the public safety risks and the costs of public emergency responses to flood, and that improvement and ongoing maintenance of the levee system is a matter of continuing urgency to protect farmlands, population centers, the state’s water quality, and the significant natural resource and habitat areas of the delta...improvement and continuing maintenance of the levee system will not resolve all flood risks and that the delta is inherently a floodprone area where in the most appropriate land uses are agriculture, wildlife habitat and where specifically provided, recreational activities, and that most of the existing levee systems are degraded in need of restoration, improvement, and continuing management.”

Land Use and Resource Management Plan for the Primary Zone of the Delta:

The Commission’s Plan includes a number of findings, policies and recommendation regarding levees. Among those are:

- Delta levees shall be maintained to protect human life, to provide flood protection, to protect private and public property, to protect historic structures and communities, to protect riparian and upland habitat, to promote interstate and intrastate commerce, to protect water quality in the state and federal water projects and to protect recreation use of the Delta area... (P-1)
- Existing programs for emergency levee repair should be strengthened and better coordinated between local, State, and federal governments and shall include: interagency agreements and coordination; definition of an emergency; designation of emergency funds; emergency contracting procedures; emergency permitting procedures; and other necessary elements. (P-4)
- To lower levee maintenance costs, streamlined permitting systems for authorization of dredging for levee maintenance and rehabilitation work, including the improvement of wildlife habitat and habitat mitigation sites, and for levee upgrading to mandated standards to protect public health and safety, should be instituted, with one state agency designated as lead agency and one federal agency designated as lead agency... (R-8)

Other Issues of Concern to the Delta Protection Commission:

The Commission has been considering additional topics which are of importance in a flood event:

- Closure of Delta waterways in periods of extremely high waters due to floods flows and tides. The Commission has addressed this issue in the past and is continuing to work with concerned parties to clarify the process to close waterways to non-essential boat traffic in periods of high water; to identify gaps in authority -local, state, and federal-to address this issue; and to pursue remedies to the identified problems.
- In the 1986 and 1997 flood events, vessels became lodged upstream of public bridges, thus endangered the stability of the bridges. The Commission staff is participating in a multi-agency group designed to enhance communication between regulatory agencies, and to develop engineering guidelines to be used in the construction of structures in waterways that are subject to high volumes and surface elevations of water in a flood event.

The Commission understands and supports the work of the FEAT. Please feel free to call upon members of the Commission or the Commission's staff for any assistance needed in the preparation of the 120 Day report or any future studies.

Sincerely,

Patrick McCarty
Chairman